

POWERS, KIRN &amp; ASSOCIATES, LLC

By: Jill Manuel-Coughlin, Esquire

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Attorney for Movant

FILED  
6/13/17 11:41 am  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Gregory S. Bulsak, aka Greg Bulsak Regina S. Bulsak, aka Gina Bulsak <div style="text-align: right;">Debtors</div>	Chapter 13 Proceeding  12-24255 GLT
CITIMORTGAGE, INC.  <div style="text-align: right;">Movant</div> v.  Gregory S. Bulsak, aka Greg Bulsak Regina S. Bulsak, aka Gina Bulsak Ronda J. Winnecour, Esquire <div style="text-align: right;">Respondents</div>	Related Dkt. Nos. 139 and 152

**CONSENT ORDER IN SETTLEMENT OF  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Motion for Relief from the Automatic Stay filed by Jill Manuel-Coughlin, Esquire on behalf of secured creditor, CITIMORTGAGE, INC. ("Movant").

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

1. The Automatic Stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. This Consent Order pertains to the property located at 1819 Renee Drive, Library, PA 15129, mortgage account ending with 3616.
3. Upon approval by the United States Bankruptcy Court of the within Consent Order, Debtors and Movant, agree to the following:
  - (a) Parties acknowledge that the current regular monthly post-petition payment is **\$345.74** per month.
  - (b) Parties acknowledge that as of June 5, 2017 the following amounts are currently due post-petition:

Monthly Payments: 1/1/2017 – 6/1/2017 @ \$345.74	\$2,074.44
Less Debtor Suspense:	(\$305.90)
<b>Total Post-Petition Arrearage:</b>	<b>\$1,768.54</b>

- (c) Parties acknowledge that as of 6/5/2017, debtors are delinquent in payments to the Chapter 13 Trustee in the amount of **\$10,065.87**.
- (d) Within thirty (30) days of the Order approving this Consent Order, debtors shall bring their arrearage to the Chapter 13 Trustee current by filing an Amended Chapter 13 Plan, and shall make all future payments as they come due for the remainder of the term for the Chapter 13 Plan.

- (e) Upon debtors curing the arrearage in Plan Payments, the Chapter 13 Trustee shall disburse the remainder of the funds to Movant be applied to the post-petition arrears as shown in paragraph 3 (b) above.
- (f) If sufficient proof is provided (front and back copies of checks or money orders) of payments made, but not credited, the account will be adjusted accordingly.
- (g) All post-petition payments from the Chapter 13 Trustee to Movant shall be sent to CitiMortgage, Inc., PO Box 9001067, Louisville, KY 40290-1067.
- (h) The provisions of the Consent Order do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this Consent Order, including fees and costs, due under the terms of the contract and applicable law.
- (i) The Debtors shall timely tender all payments and comply with all conditions in accordance with this Consent Order. If such payments or conditions are not timely made, or if the case should convert to a Chapter 7 Bankruptcy, Movant may provide the Debtors and their counsel with fifteen (15) days written notice of default. If the default is not cured within the fifteen (15) day period, Movant may certify the default to this Court and an Order shall be entered granting Movant relief from the automatic stay without further notice and hearing and waiving FED. R. Bankr. P. 3002.1 and waiving Rule 4001 (a)(3) so that the Relief Order is immediately effective and enforceable.
- (j) The parties agree that a facsimile may be submitted to the Court as if it were an original.

STIPULATED AND AGREED TO BY:

**/s/ Matthew M. Herron, Esquire**

Matthew M. Herron, Esquire

Attorney for Debtors

Date: 6/6/2017

**/s/ Jill Manuel-Coughlin, Esquire**

Jill Manuel-Coughlin, Esquire

Attorney for Movant

Date: 6/6/2017

**/s/ Ronda J. Winnecour, Esquire**

Ronda J. Winnecour, Esquire

Trustee

Date: 6/7/2017

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Gregory S. Bulsak, aka Greg Bulsak Regina S. Bulsak, aka Gina Bulsak  Debtors	Chapter 13 Proceeding  12-24255 GLT
CITIMORTGAGE, INC.  v.  Gregory S. Bulsak, aka Greg Bulsak Regina S. Bulsak, aka Gina Bulsak Ronda J. Winnecour, Esquire  Movant  Respondents	

**ORDER APPROVING CONSENT ORDER**

AND NOW, this 13th day of June, 2017, the Consent Order Resolving CITIMORTGAGE, INC.'s Motion for Relief from the Automatic Stay is hereby approved by the Court.

  
United States Bankruptcy Judge  
Gregory L. Taddonio

Dated: 6/13/17

cm: Jill Manuel-Coughlin, Esq.

## Imaged Certificate of Notice Page 4 of 4

United States Bankruptcy Court  
Western District of PennsylvaniaIn re:  
Gregory S. Bulsak  
Regina S. Bulsak  
DebtorsCase No. 12-24255-GLT  
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: gamr  
Form ID: pdf900Page 1 of 1  
Total Noticed: 1

Date Rcvd: Jun 13, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 15, 2017.

db/jdb +Gregory S. Bulsak, Regina S. Bulsak, 1819 Renee Drive, South Park, PA 15129-9359

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.****Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jun 15, 2017

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 13, 2017 at the address(es) listed below:

Allison F. Wells on behalf of Creditor BANK OF AMERICA, N.A., AS SUCCESSOR BY MERGER TO BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP pawb@fedphe.com, fedphe@hotmail.com;amber.zinski@phelanhallinan.com

Harry B. Reese on behalf of Creditor CITIMORTGAGE, INC. harry.reese@pkallc.com, chris.amann@pkallc.com;nick.bracey@pkallc.com;samantha.gonzalez@pkallc.com;jill@pkallc.com

James Warmbrodt on behalf of Creditor BANK OF AMERICA, N.A. bkgroup@kmlawgroup.com

Jill Manuel-Coughlin on behalf of Creditor CITIMORTGAGE, INC. jill@pkallc.com, chris.amann@pkallc.com;nick.bracey@pkallc.com;samantha.gonzalez@pkallc.com;harry.reese@pkallc.com

Matthew M. Herron on behalf of Joint Debtor Regina S. Bulsak mmh@thedebedtctors.com, hgs@thedebedtctors.com;alb@thedebedtctors.com

Matthew M. Herron on behalf of Debtor Gregory S. Bulsak mmh@thedebedtctors.com, hgs@thedebedtctors.com;alb@thedebedtctors.com

Matthew M. Herron on behalf of Attorney The Debt Doctors at Quatrini Rafferty mmh@thedebedtctors.com, hgs@thedebedtctors.com;alb@thedebedtctors.com

Matthew M. Herron on behalf of Attorney The Debt Doctors, LLC mmh@thedebedtctors.com, hgs@thedebedtctors.com;alb@thedebedtctors.com

Office of the United States Trustee ustpreion03.pi.ecf@usdoj.gov

Ronda J. Winnecour cmecf@chapter13trusteedpa.com

Stephen J. Hanak on behalf of Debtor Gregory S. Bulsak sjh@thedebedtctors.com, hgs@thedebedtctors.com;sls@legalhelpers.com;ssmith@maceybankruptcylaw.com

Stephen J. Hanak on behalf of Joint Debtor Regina S. Bulsak sjh@thedebedtctors.com, hgs@thedebedtctors.com;sls@legalhelpers.com;ssmith@maceybankruptcylaw.com

TOTAL: 12